

EXHIBIT 6

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UNITED STATES DISTRICT COURT

IN AND FOR THE DISTRICT OF WYOMING

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STEPHANIE WADSWORTH, :
Individually and as
Parent and Legal :
Guardian of W.W., K.W.,
G.W. and L.W., minor : Case No.
children, and MATTHEW 2:23-cv-00118-NDF JURY
WADSWORTH, :

Plaintiff, :

v. :

WALMART, INC. and JETSON :
ELECTRIC BIKES, LLC, :

Defendants.

DEPOSITION OF MATTHEW WADSWORTH
TAKEN THROUGH
VERITEXT

Taken on Monday, February 26, 2024
9:57 a.m. to 2:47 p.m.

At HAMPTON INN
1055 Wild Horse Canyon Road
Green River, Wyoming 82935

Reported by: Abigail D.W. Johnson, RPR, CRR, CRC
Job No.: CS6457156

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1 A. We would only do that when we got out there
2 before we would put any fresh ash into it.

3 Q. Okay. And how often were the ashtrays
4 emptied into the galvanized can?

5 A. When there was -- when they were full.

6 Q. Okay. And would they fill up daily?

7 A. No.

8 Q. Every other day?

9 A. I don't know the time or how long it would
10 take to fill them, but not daily.

11 Q. Okay. I assume in the winter months, you
12 would use the smoking shed more than in the summer
13 months?

14 A. Correct.

15 Q. Okay. Meaning, it was there to protect you
16 from the weather; right?

17 A. Correct.

18 Q. How often was the two-gallon galvanized can
19 emptied? As-needed?

20 A. Emptied weekly.

21 Q. Okay.

22 A. With the garbage.

23 Q. Where did you get the two-gallon galvanized
24 can?

25 A. I don't recall. It was for cleaning out